

MATTHEW MACLEAR (State Bar No. 209228)  
Email: mcm@atalawgroup.com  
JASON FLANDERS (State Bar No. 238007)  
Email: jrf@atalawgroup.com  
ERICA A. MAHARG (State Bar No. 279396)  
Email: eam@atalawgroup.com  
J. THOMAS BRETT (State Bar No. 315820)  
Email: jtb@atalawgroup.com  
AQUA TERRA AERIS LAW GROUP 4030  
Martin Luther King Jr Way  
Oakland, CA 94609  
Tel: (415) 568-5200

[Additional counsel on p. 2]

Attorneys for Plaintiff  
CALIFORNIA SPORTFISHING PROTECTION  
ALLIANCE

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

CALIFORNIA SPORTFISHING  
PROTECTION ALLIANCE,

Plaintiff,

v.

PACIFIC BELL TELEPHONE  
COMPANY,

Defendant.

Case No. 2:21-CV-00073-JDP

**NOTICE OF LODGING OF AMENDED  
FINAL CONSENT DECREE**

Date: November 7, 2024  
Time: 10:00 a.m.  
Judge: Hon. Jeremy D. Peterson  
Courtroom: 9

1 ANDREW L. PACKARD (State Bar No. 168690)  
2 Email: andrew@packardlawoffices.com  
3 LAW OFFICES OF ANDREW L. PACKARD  
245 Kentucky Street, Suite B3  
4 Petaluma, CA 94952  
Tel: (707) 782-4060; Fax: (707) 782-4062

5 WILLIAM VERICK (State Bar No. 140972)  
6 Email: wverick@igc.org  
7 KLAMATH ENVIRONMENTAL LAW CENTER  
1125 16th Street, Suite 204  
Arcata, CA 95521  
Tel: (707) 630-5061; Fax: (707) 630-5064

8 J. KIRK BOYD (State Bar No. 122759)  
9 Email: jkb@drjkb.com  
10 LAW OFFICE OF JOHN KIRK BOYD  
548 Market St., Suite 1300  
San Francisco, CA 94104-5401  
Tel: (415) 440-2500

11 BRIAN ACREE (State Bar No. 202505)  
12 Email: brian@brianacree.com  
13 LAW OFFICES OF BRIAN ACREE  
331 J Street, Suite 200  
Sacramento, CA 95814  
14 Tel: (916) 505-6861

15 WILLIAM CARLON (State Bar No. 305739)  
16 Email: william@carlonlaw.com  
17 LAW OFFICE OF WILLIAM CARLON  
437 Post Street  
Napa, CA 94559  
18 Tel: (530) 514-4115

1 TO THE COURT AND ALL ATTORNEYS OF RECORD, PLEASE TAKE NOTICE THAT:

2 On September 18, 2024, the California Sportfishing Protection Alliance (“CSPA” or  
3 “Plaintiff”) filed a motion requesting Court approval of a settlement and for entry of a consent  
4 decree between the parties, Plaintiff CSPA and Defendant Pacific Bell Telephone Company.

5 One of the Claims for Relief that was settled in this action was a claim based on the  
6 discharge to drinking water provisions of California Health & Safety Code section 25249.5 et seq.  
7 (Proposition 65). Proposition 65 requires that any settlement must be submitted to the trial court  
8 on noticed motion for that court’s approval. Proposition 65 further requires that 45 days notice be  
9 given to California’s Attorney General of the hearing date for the motion to approve the settlement.

10 After Plaintiff served the California Attorney General with its motion to approve the  
11 settlement of this matter, the Attorney General’s Office contacted counsel, requesting that the  
12 proposed Consent Decree be amended to more clearly define the terms of Plaintiff’s release in the  
13 public’s interest regarding Defendant’s liability for plaintiff’s Claim for Relief based on Proposition  
14 65.

15 The parties met and conferred and agreed to amend the proposed Consent Decree, a true  
16 and correct copy of which is filed with this Notice. The California Attorney General has contacted  
17 the parties and advised them that the amended proposed Consent Decree has addressed the Attorney  
18 General’s concerns. (See the Declaration of Matthew C. Maclear). A copy of this Notice and the  
19 supporting declaration was e-mailed to Deputy Attorney General Susan Fiering on October 28,  
20 2024.

21  
22 DATED: October 28, 2024

AQUA TERRA AERIS LAW GROUP

23  
24 By: /s/ Matthew C. Maclear  
25 MATTHEW C. MACLEAR

26 Attorneys for Plaintiff  
27 CALIFORNIA SPORTFISHING  
28 PROTECTION ALLIANCE